

### **Figure 4-2. ATOS Surveillance Implementation Guidelines.**

- **ATOS is not a Program Tracking and Reporting System (PTRS).**
  - The ATOS Inspector Work Plan replaces the work plans generated under the National Program Guidelines; it is not a substitute for PTRS.
  - We can't think in terms of PTRS and use ATOS for work or time accountability.
  - Everyone still feels like they have to enter something to show they were working.
  - Some inspectors are doing PTRS-type activities disguised as ATOS.
  - ATOS is a system – if you dismantle ATOS and pull this piece out and that piece out, you no longer have a system.
- **Planning is a critical element in ATOS.**
  - Do not do the work activities first and then figure out how to plug it into the system. That is NOT a system safety approach.
  - Planning for ATOS surveillance implementation starts with the Principal Inspectors who should include instructions to provide guidance on the type, location, and timing of inspection activities.
  - The PI may give instructions for the completion of an SAI or EPI by a specific date or the PI may request that the activities take place at certain locations or involve certain makes/models.
  - The CSP provides the CMT with a plan that is tailored to the surveillance requirements for their air carrier.
  - The PI can help to ensure the CMT receives surveillance results in a timely manner by using the instructions feature in the CSP to prioritize inspections and set reasonable timelines for completion.
- **The first step is to review the Inspector Work Plan.**
  - The inspector reviews the Inspector Work Plan and coordinates the inspection activities with his or her schedule.
  - Geographic inspectors have an additional responsibility to coordinate and communicate their activities in completion of the Inspector Work Plan with both their supervisor and the CMT Principal.
- **The next step is preparation for the assigned inspection.**
  - It was not envisioned that inspections would be conducted without this preparation, which is extensive for the first such inspection conducted by the inspector.
  - Preparation starts with a thorough review of the applicable data collection tool.
  - The ATOS data collection tools list all pertinent regulations, policy, and advisory documents that pertain to the inspection.
  - This allows the inspector to research and refresh his/her knowledge appropriately and to actually plan and prepare for an inspection.
  - The inspector applies his/her planning and judgment to select the numbers and locations of inspection activities to perform to be able to answer all of the questions in a thorough and quality manner.

- **General Guidance for Planning Inspection Activities.**
  - The key question to ask in determining how many activities to plan is: “Are the events likely to vary over time and place?”
  - The next thing to do is review the specific data collection tool and think about the purpose of that element.
    - For an SAI, you need to determine how you can find out how that function or process is performed.
    - On an EPI, you need to determine how you can tell if the function or process is being performed correctly.
    - You should be thinking about events that are directly observable and will give you an idea of what the process is or how the process works.
  - Each activity should consist of stand-alone and observable events.
  - Most element performance inspection activities will lead to observing the aircraft or flight operations if all aspects of the element are fully examined.
  - Surveillance is making observations and recording those observations at the most basic level.
- **It is not appropriate to combine SAI and EPI.**
  - SAI and EPI inspection activities have different purposes.
    - The SAI is looking to see if there is a system in place and does that system incorporate the safety attributes.
    - The EPI is validating the performance of the system – Is the operator following their system procedures? And is that system accomplishing the desired result of safety and regulatory compliance?
  - Simultaneously doing an SAI and EPI is not appropriate.
  - There is no need to have the same person doing both the SAI and EPI for an element. In fact, this may not be the most beneficial because an independent look may provide better information.
- **The Data Collection Tools are not checklists.**
  - Each data collection tool lists a series of questions for the inspector or team of inspectors to answer.
  - The numbered questions in all data collection tools require either yes or no responses and, in some cases, not applicable (N/A).
  - The inspector plans individual activities that will help the inspector answer the questions.
- **It generally takes multiple activities to complete an inspection.**
  - Responses are entered only for those questions that can be answered from the single activity being reported.
  - It does not matter how many questions are answered during each activity, as long as all the questions are answered by the time the report is saved as final.
- **Data collection tools are completed based on surveillance activities.**
  - The data collection tools are not designed to be a series of questions to ask the air carrier’s personnel.
  - It is inappropriate to give the air carrier a copy of the data collection tool and ask them to “fill it out.”

- The inspector should ask his or her own questions to find out about the policies and procedures of the air carrier.
- You do not ask a person, “Are you responsible?” Rather, you ask questions, make observations, and perform other tests to find out enough about how the carrier performs that process to determine for yourself who is responsible.
- **The data collection tool questions must not be re-written by CMT or inspectors.**
  - This will corrupt the data entered into the ATOS repository and invalidate the system.
- **Performing Assigned Safety Attribute Inspections (SAI).**
  - SAI are completed by a team of inspectors to evaluate a subsystem or a portion of a subsystem.
  - Each team member is responsible for completing certain elements within a system, or a particular attribute section, or possibly certain questions within an attribute section. This allows the distribution of inspection activity among the SAI team to obtain accurate data in a timely manner.
  - After performing their inspection activities, each SAI team member is responsible for reporting their own responses into ATOS automation.
  - Although communication between team members is essential, there is no need to share answers between team members for the purpose of having each team member answer every question. In fact, this is an undesirable action resulting in duplication.
  - SAI Team Coordinators (TC) play an important role in organizing and coordinating SAI team activities.
  - The SAI TC, in conjunction with the remaining SAI team members, divides and distributes the SAI activities.
  - The TC is responsible for ensuring that activities, such as personnel interviews, are not repetitive or redundant, and that all activities are completed to accurately answer the questions on the SAI.
  - The TC is a leadership role that should be assigned to an experienced inspector, with a solid knowledge of the air carrier, who is based near the location where most SAI activities will take place.
  - The Team Coordinator is not a supervisor and is not responsible for team member performance.
  - If the TC encounters difficulties with a team member during an inspection, the situation should be elevated through the PI to that team member’s supervisor for resolution.
- **Performing Assigned Element Performance Inspections (EPI).**
  - The inspector will independently determine the number of inspection activities that will be accomplished to complete an inspection.
  - Generally it takes at least 5-10 surveillance activities to answer all the EPI questions.
  - Once an EPI is opened, it should be completed and saved as final within 30 to 60 days. This will provide a continuous flow of information for determining whether retargeting is necessary.
  - The ASI will accomplish EPI in accordance with the specific instructions on the data collection tool and any additional written instructions from the PI.

- The number of individual activities necessary to accomplish this EPI can be coordinated between the PI and the assigned ASI.
- When completing an individual activity for an EPI, the ASI will answer and enter responses only to those questions that can be answered from the activity being reported.
- **Observations requiring immediate action.**
  - Significant issues or items of immediate concern, as determined by the inspector, arising from inspections shall be verbally conveyed to the PI in a timely manner.
  - This is not a departure from what conscientious inspectors have always done in the past when they observed a safety concern or possible regulatory violation.
  - Pick up the telephone and call the appropriate PI, Assistant PI, APM, or PPM at the CHDO/CMO, or send an email message or a FAX. The key point is to coordinate with the PI and work with the CMT to determine appropriate actions.